

MOSES & SINGER LLP
 Robert D. Lillienstein (RL-4585)
 Declan M. Butvick, Esq. (DB-8289)
 405 Lexington Avenue
 New York, New York 10174
 (212) 554-7800 (telephone)
 (212) 554-7700 (facsimile)

*Attorneys for Defendants Northern Leasing Systems, Inc.,
 Jay Cohen, Rich Hahn, and Sara Krieger*

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

-----	X	
MELINDA SERIN, JUDSON RUSS, LONG SOU	:	
LIM, PERI KETTLER, GORDON REDNER, AND	:	
THOMAS J. SMITH,	:	
	:	
Plaintiffs,	:	
	:	06 CV 1625 (JSG)
-against-	:	
	:	
NORTHERN LEASING SYSTEMS, INC., JAY	:	
COHEN, RICH HAHN, and SARA KRIEGER,	:	
	:	
Defendant.	:	
-----	X	

**NOTICE OF MOTION *IN LIMINE*
 TO EXCLUDE THE TESTIMONY OF PLAINTIFFS'
DAMAGE EXPERT, DR. STAN V. SMITH**

PLEASE TAKE NOTICE THAT upon the accompanying declaration of Robert D. Lillienstein, Esq., dated November 3, 2010, together with the exhibits annexed thereto, and the accompanying Memorandum of Law, and upon the pleadings and prior proceedings had herein, Defendants Northern Leasing Systems, Inc., Jay Cohen, Rich Hahn, and Sara Krieger (the "Defendants"), hereby move this Court, before the Honorable James S. Gwin, United States District Court, Carl B. Stokes United States

Court House, 801 West Superior Avenue, Cleveland, Ohio 44113-1838, for an order pursuant to Rule 702 of the Federal Rules of Evidence, excluding the expert testimony and reports of Stan V. Smith as to each of the Plaintiffs, and for such further relief as this Court deems just and proper.

Dated: November 3, 2010
New York, New York

MOSES & SINGER LLP
Attorneys for Defendants

By: _____/s/_____
Robert D. Lillienstein, Esq. (RL-4585)
Declan M. Butvick, Esq. (DB-8289)
405 Lexington Avenue
New York, New York 10174
(212) 554-7807 (telephone)
(917) 206-4307 (facsimile)
rlillienstein@mosessinger.com
dbutvick@mosessinger.com

TO:

VIA ECF
Krishnan Chittur, Esq.
CHITTUR & ASSOCIATES, P.C.
286 Madison Avenue Suite 1100
New York, New York 10017

Attorneys for Plaintiffs